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7

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 ***

11 LAS VEGAS DEVELOPMENT GROUP, LLC,)
a Nevada limited liability company,)

12)
13 Plaintiff,)

14 vs.)

15 2014-1 IH BORROWER, LP, a Delaware)
limited partnership; REPUBLIC MORTGAGE,)
16 LLC, a Nevada limited liability company;)
RECONTRUST COMPANY, NA, a Texas)
17 corporation; MAGDALENA MANCHESTER,)
an individual; MAGDALENA M.)
MANCHESTER REVOCABLE TRUST, a)
18 trust; FEDERAL NATIONAL MORTGAGE)
ASSOCIATION, a federally chartered)
19 corporation; THR NEVADA II, LP, a Delaware)
limited partnership; THR PROPERTY)
20 BORROWER, LP, a Delaware limited)
partnership; THR PROPERTY GUARANTOR,)
21 LP, a Delaware limited partnership; THR)
PROPERTY HOLDCO, LP, a Delaware limited)
22 partnership; 2014-1 IH PROPERTY HOLDCO,)
LP, a Delaware limited partnership, 2014-1 IH)
23 EQUITY OWNER, LP, a Delaware limited)
partnership; CHRISTINA TRUST, a division of)
24 Wilmington Savings Fund Society, FSB, a)
federal savings bank; DOE individuals I through)
25 XX; and ROE CORPORATIONS I through)
XX,)

26)
27 Defendants.)
28

Case No. 2:15-cv-00396-RFB-GWF

STIPULATION AND ORDER TO
AMEND BRIEFING SCHEDULE
RELATED TO MOTION FOR
SUMMARY JUDGMENT [ECF #118]
(Second Request)

1 and)
2 FEDERAL HOUSING FINANCE AGENCY,)
3 as Conservator of the Federal National)
Mortgage Association,)
4 Intervenor.)
5)
6 FEDERAL NATIONAL MORTGAGE)
ASSOCIATION,)
7 Counter-Plaintiff,)
8 vs.)
9 LAS VEGAS DEVELOPMENT GROUP, LLC;)
10 HIDDEN CANYON OWNERS)
ASSOCIATION,)
11 Counter-Defendants.)
12)
13 AND ALL RELATED CLAIMS)
14)

15 **STIPULATION AND ORDER TO AMEND BRIEFING SCHEDULE**
16 **RELATED TO MOTION FOR SUMMARY JUDGMENT [ECF #118]**
17 **(Second Request)**

18 COMES NOW Plaintiff, LAS VEGAS DEVELOPMENT GROUP, LLC (“LVDG”), and
19 Defendants, FEDERAL NATIONAL MORTGAGE ASSOCIATION (“Fannie Mae”) and
20 FEDERAL HOUSING FINANCE AGENCY (“FHFA”), by and through their undersigned
21 counsel, and hereby stipulate and agree as follows:

- 22 1. On January 17, 2018, Fannie Mae and FHFA filed a Motion for Summary
23 Judgment herein [Doc. #118].
- 24 2. Pursuant to a Scheduling Order entered herein on January 9, 2018 [ECF #117], a
25 Response to said Motion for Summary Judgment was due on February 14, 2018,
26 and any Reply was due on March 7, 2018.
- 27 3. On February 14, 2018, the parties submitted a stipulation to modify the briefing
28 schedule related to said motion. [ECF #121]. This stipulation was granted on
February 15, 2018. [ECF #122]. Pursuant to said stipulation, a response to the

1 motion was due on February 26, 2018, and a reply is due on March 21, 2018.

2 4. LVDG's counsel has requested an additional extension of time to prepare and file
3 a Response to the Motion for Summary Judgment due to numerous other pending
4 legal matters and a family emergency.

5 5. The parties agreed to an extension on February 26, 2018, however, LVDG's
6 counsel left the office due to a family emergency before it was submitted.
7 Pursuant to the parties' agreement, they had agreed that a response should be filed
8 by February 28, 2018.

9 6. LVDG's counsel was unable to return to the office until February 28, 2018, and is
10 unable to comply with the previously agreed amended deadline.

11 7. LVDG shall have an additional period of time until and including March 2, 2018,
12 in which file a Response to the Motion for Summary Judgment.

13 8. LVDG's counsel respectfully submits that good cause exists for the late filing of
14 the instant stipulation under the circumstances at hand.

15 9. Fannie Mae and FHFA shall have an additional period of time until and including
16 March 30, 2018, in which to file any Replies.

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10. This Stipulation is made in good faith and not for purpose of delay.

Dated this 28th day of February, 2018.

ROGER P. CROTEAU &
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FENNEMORE CRAIG, P.C.

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IT IS SO ORDERED.



RICHARD F. BOULWARE, II
United States District Judge

DATED this 5th day of February, 2018.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of February, 2018, I served via the CM/ECF electronic filing system, the foregoing **STIPULATION AND ORDER TO AMEND BRIEFING SCHEDULE RELATED TO MOTION FOR SUMMARY JUDGMENT [ECF #118] (Second Request)** to the following parties:

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